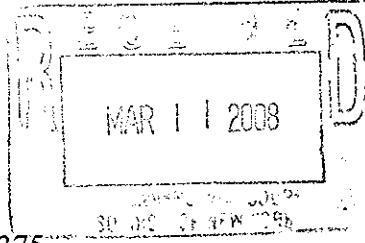


UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK



In re: ) Chapter 11  
 )  
DJK Residential LLC, et al.,<sup>1</sup> ) Case No. 08-10375  
 )  
Debtors ) Joint Administration Requested

**OBJECTION TO ADEQUACY OF DISCLOSURE STATEMENT  
AND OBJECTION TO CONFIRMATION OF THE PLAN**

1. The Objection is submitted on behalf of IFL Industries, Inc., a/k/a Airquest Industries, Inc., and William D. Olson, who are Plaintiffs in the matter of IFL Industries, Inc., a/k/a Airquest Industries, Inc., and William D. Olson v. Sirva, Inc. (f/k/a Allied Worldwide); Allied Van Lines, Inc.; North American Van Lines, Inc.; Global Van Lines, Inc.; Unigroup, Inc.; Mayflower Transit, LLC; United Intermode, LLC; and Atlas Van Lines, Inc., United States District Court for the Northern District of Illinois Eastern Division, Case 08 CV 60.

2. The Objectors have an unliquidated non-dischargeable claim against the Debtors in an amount believed to be in excess of \$15,000,000. The exact nature of the claim is

<sup>1</sup> The Debtors in these cases include: DJK Residential LLC; A Five Star Forwarding, Inc.; A Relocation Solutions Management Company; A Three Rivers Forwarding, Inc.; A.V.L. Transportation, Inc.; Alaska USA Van Lines, Inc.; Allied Alliance Forwarding, Inc.; Allied Continental Forwarding, Inc.; Allied Domestic Forwarding, Inc.; Allied Freight Forwarding, Inc.; Allied Intermodal Forwarding, Inc.; Allied International , N.A., Inc.; Allied Interstate Transportation, Inc.; Allied Transcontinental Forwarding, Inc.; Allied Transportation Forwarding, Inc.; Allied Van Lines Terminal Company; Allied Van Lines, Inc.; Allied Van Lines, Inc. of Indiana; Americas Quality Van Lines, Inc.; Anaheim Moving Systems, Inc.; Cartwright Moving & Storage Co., Inc.; Cartwright Van Lines, Inc.; City Storage and Transfer, Inc.; CMS Holding, LLC; Executive Relocation Corporation; Federal Traffic Service, Inc; Fleet Insurance Management, Inc.; FrontRunner Worldwide, Inc.; Global Van Lines, Inc.; Global Worldwide, Inc.; Great Falls North American, Inc.; Lyon Van Lines, Inc.; Lyon Worldwide Shipping, Inc.; Manufacturing Support Services, LLC; Meridian Mobility Resources, Inc.; Move Management Services, Inc.; NA (UK) GP Corporation; NACAL, Inc.; NAVL LLC; NorAm Forwarding, Inc.; North American Forwarding, Inc; North American International Holding Corporation; North American International N.A., Inc.; North American Logistics, Ltd.; North American Van Lines of Texas, Inc.; North American Van Lines, Inc.; Relocation Risk Solutions, LLC; RS Acquisition Holding, LLC; RS Acquisition, LLC; SIRVA Container Lines, Inc.; SIRVA Freight Forwarding, Inc.; SIRVA Global Relocation, Inc.; SIRVA Imaging Solutions, Inc.; SIRVA MLS, Inc.; SIRVA Relocation LLC; SIRVA Settlement of Alabama, LLC; SIRVA Settlement, Inc.; SIRVA Worldwide, Inc.; SIRVA, Inc.; Trident Transport International, Inc.

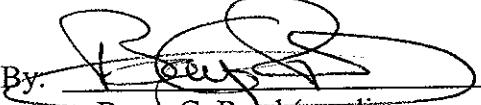
set forth in the appended Complaint filed and served in the above-referenced matter  
(Exhibit A, hereto).

3. The Objectors object to both the adequacy of the Disclosure Statement and to Confirmation of the Plan as submitted.

4. Pursuant to the Court's Scheduling Order of February 5, 2008, and the subsequent Notice of Rescheduled Combined Hearing filed by Debtors' counsel on March 6, 2008, Objectors will supplement this Objection on or before April 11, 2008.

Dated: 3-10-08

ZIMMERMAN REED, PLLP

By: 

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